



Preserving America's Heritage

March 4, 2009

Stephanie Toothman, Ph.D.
Acting Superintendent
National Mall and Memorial Parks
900 Ohio Drive, S.W.
Washington, DC 20024

Ref: *Continued Section 106 consultation on the development of the National Mall Plan
Washington, DC*

Dear Dr. Toothman:

The Advisory Council on Historic Preservation (ACHP) received your invitation to continue consultation on the National Park Service's (NPS) proposed National Mall Plan (Mall Plan). We understand the NPS has now developed a preliminary preferred alternative for the Mall Plan, taking into consideration the input of cooperating federal and local agencies, Section 106 consulting parties, and the public. We look forward to consulting with the NPS, the District of Columbia State Historic Preservation Office (SHPO), and the many other consulting parties on this preliminary preferred alternative to seek ways to avoid, minimize, and mitigate the potential adverse effects of the proposed undertaking on historic properties.

In the NPS' third newsletter about planning for the National Mall and Pennsylvania Avenue National Historic Park, the NPS identified certain "common actions" that would be undertaken independent of the selection of a preferred alternative for the Mall Plan. These common actions include deferred maintenance, memorial lighting, water feature operations, turf maintenance, and pedestrian wayfinding and signage. Consistent with this approach to planning, we recently received your notification regarding the development of the comprehensive signage project for the National Mall and Memorial Parks. This notification explains that the majority of the proposed signs meet the criteria for streamlined Section 106 review pursuant to stipulation III of the 2008 nationwide Programmatic Agreement (PA) among the NPS, the ACHP, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act. Two proposed sign types, the pedestrian guides, do not meet the criteria under the nationwide PA, however, and are subject to the standard Section 106 process.

In light of the complex nature of the Mall Plan and the potential confusion that lies in the intersection of these multiple actions, we recommend the NPS dedicate a portion of the next Section 106 consultation meeting for the Mall Plan to discuss these common actions, and the wayfinding and signage project in particular. We urge the NPS to discuss the relation of these actions to the Mall Plan, how they might be coordinated with the development of the Mall Plan, and how the Section 106 process for these actions will be handled. We believe that the NPS should facilitate such a discussion to ensure the consulting

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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parties fully understand the opportunities available for consultation under the Section 106 review process for not only the Mall Plan but also these other actions.

We commend the NPS for providing the consulting parties and the public with a significant amount of information relating to the development of the Mall Plan and the historic properties that might be affected by the Mall Plan. In order to further ensure the planning process remains as transparent as possible, we encourage the NPS to consider ways in which the vast amounts of information might be more clearly organized and presented to consulting parties. We are prepared and willing to assist in this effort, should you desire our help.

We recognize the challenges inherent in this proposed undertaking, and we look forward to working with the NPS in the consultation process. Please ensure the consulting parties receive a copy of this letter. If you have any questions, please contact Kelly Fanizzo at 202-606-8583 or by e-mail at kfanizzo@achp.gov.

Sincerely,



for Reid Nelson
Director
Office of Federal Agency Programs